

SUB-CONTRACTOR

EHS Minimum Requirements



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Purpose and scope of document



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The intent of this document is to ensure that all contractors, sub-contractors and service providers who are engaged to provide any works, labour or temporary workers (each being a "Sub-Contractor(s)") to Kirby Group Engineering ULC and any of its subsidiaries (Kirby) comply with all statutory requirements with regard to Environment, Health And Safety (EHS) legislation and that procedures are in place to achieve this objective in order to safeguard the safety, health and welfare of all persons on or about the site and to minimise harmful impacts to the environment. Where temporary workers are provided to Kirby under an approved Kirby Labour Agency Agreement, Kirby will ensure that such Temporary Worker is made aware of the requirements in this Policy, including in respect of Sections 6 and 7.

It should be noted that this document and the references quoted below do not cover all site activities and it therefore remains the contractor's responsibility to ensure that their works are conducted in a safe and environmentally responsible manner which complies with relevant legislation within the relevant jurisdiction which is current at that time.

This document of necessity covers legal requirements briefly only. As a sub-contractor you shall therefore refer to the full text of all relevant legislation. Kirby accepts no responsibility for any errors or omissions herein. Kirby will endeavour to support you in implementing these requirements and so expect that you will be open, honest and work with us always to achieve our targets and objectives.

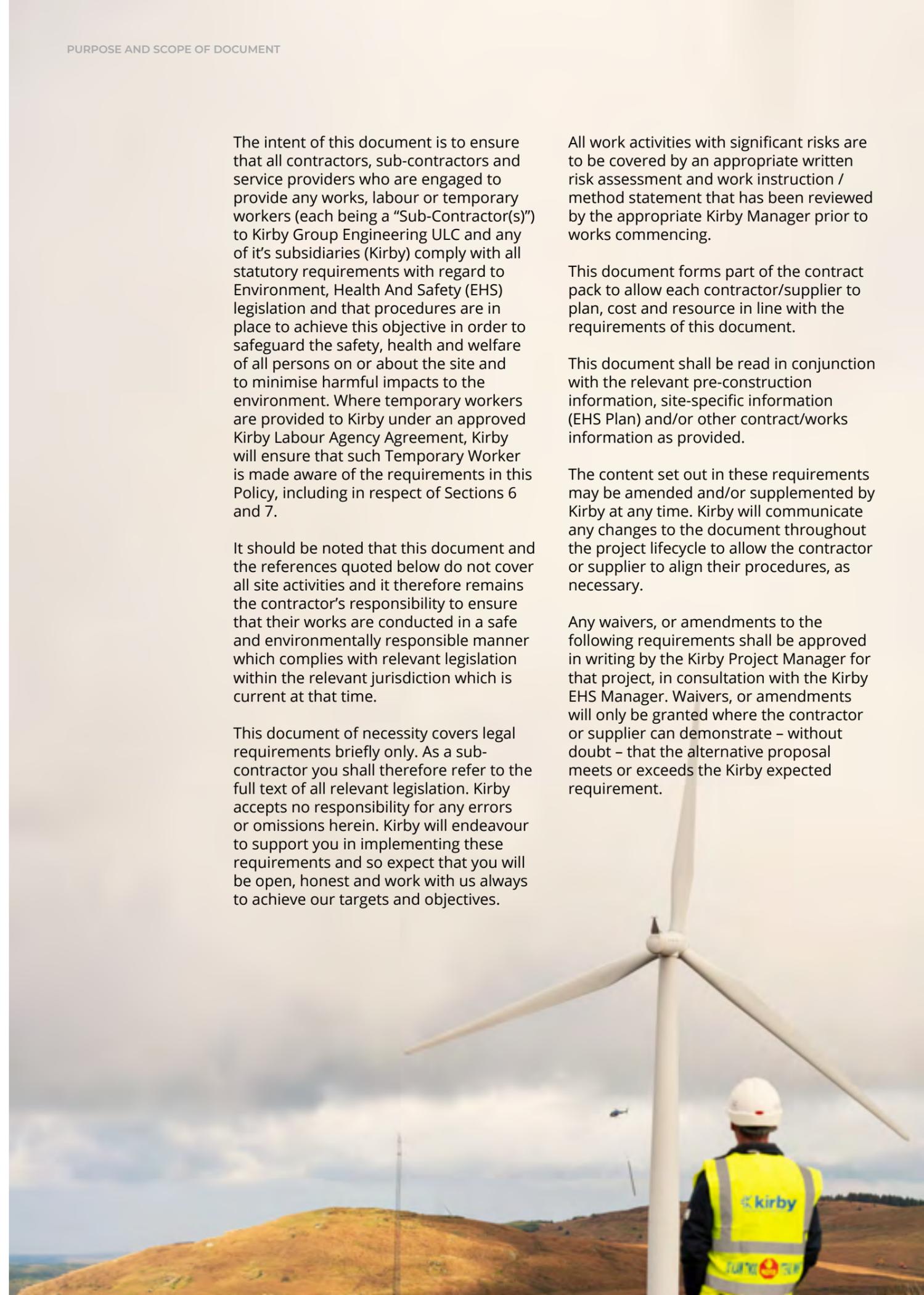
All work activities with significant risks are to be covered by an appropriate written risk assessment and work instruction / method statement that has been reviewed by the appropriate Kirby Manager prior to works commencing.

This document forms part of the contract pack to allow each contractor/supplier to plan, cost and resource in line with the requirements of this document.

This document shall be read in conjunction with the relevant pre-construction information, site-specific information (EHS Plan) and/or other contract/works information as provided.

The content set out in these requirements may be amended and/or supplemented by Kirby at any time. Kirby will communicate any changes to the document throughout the project lifecycle to allow the contractor or supplier to align their procedures, as necessary.

Any waivers, or amendments to the following requirements shall be approved in writing by the Kirby Project Manager for that project, in consultation with the Kirby EHS Manager. Waivers, or amendments will only be granted where the contractor or supplier can demonstrate – without doubt – that the alternative proposal meets or exceeds the Kirby expected requirement.





Definitions



02

Term & Abbreviation

CAT	Cable Avoidance Tool
DABs	Daily Activity Briefings
HAV	Hand Arm Vibration
KIRBY	Kirby Group Engineering
MEWP	Mobile Elevated Work Platform
SDS/COSHH	Safety Data Sheet / Control of Substances Hazardous to Health
PPE	Personal Protective Equipment
RAMS	Risk Assessments Method Statements
SEOR	Safety Environment Observation Report
SPA	Safe Plan of Action
SWL	Safe Working Load
TWC	Temporary Work Coordinator
WBV	Whole Body Vibration





Zero Harm

is the vision that guides all of Kirby's operations and activities. Our commitment is to continually strive to reach the highest Health and Safety standards, minimise our environmental impact, and work cooperatively with our people and host communities.



03

At Kirby, our vision for the Zero Harm program is to establish an environment that prioritises safety and well-being, integrating these aspects seamlessly into our everyday operations. Zero Harm is simply CARING for our people.

The Kirby Zero Harm Program embraces a comprehensive approach to enhancing safety and performance, encompassing eight core leading indicators. These indicators serve as fundamental pillars in improving safety and operational excellence.

The Kirby Zero Harm program includes all our employees, sub-contractor and agency people. You will be required to participate with this program as part of our project delivery. We believe that by working together we will all send our people home safely each day.

In essence, Zero Harm is not just an operational decision - it's a reflection of our commitment to our people. We believe it's the next step in our journey towards a safer, better future at Kirby. So, let's embark on this journey together, making Zero Harm not just a program, but a lived reality at Kirby.

The eight core Leading Indicators



Quality Safety Performance Assessments (SPA's)

This process necessitates group involvement in examining potential hazards, promoting open dialogue about workplace conditions, and establishing risk mitigation strategies. The SPA's need to be frequently reviewed and adjusted to align with changes in conditions.



SEOR & BNC Compliance - Good Save

SEOR (Safety Environment Observation Report) and BNC (Behavioural Non-Compliance) processes stimulate everyone in the organisation to rectify any unsafe conditions or behaviours and escalate the situation if necessary.



Craft Safety Team (CST)

Led by a safety-conscious leader, this group consists of operatives direct and supply chain. The team's main objective is to drive the use and acknowledgement of the SEOR, ensuring a secure environment.



Project Leader

The site managers or project leaders will devote the first hour of each day to fieldwork, participating in "White Board" meetings and formulating SPAs. They will also engage in monthly TBTs/"Stand UPs" and be present at all new hire inductions to foster a safety culture.



Communication

Regular monthly and quarterly communications are released, spreading lessons learned from incidents, sharing safety-focused content (like "Focus4Safety"), recognising good safety practices, and discussing initiatives and high-risk activities.



Skills & Will Matrix

A key tool for managing team member talent, this matrix is designed to pinpoint high performers and identify those who might benefit from additional resources, training, or support.



Tool-Box Talk Training

All site supervisors and EHS personnel will participate in a communication workshop aimed at enabling better engagement with work crews on safety promotion.



Corporate Visibility

When corporate executives visit the site, they interact with operatives and conduct a leadership tour, which further emphasises the company's commitment to safety and engagement at all levels.



Responsibilities of the Sub-contractor



04



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4.1 Responsibilities as an Employer:

As an employer of labour, you shall comply with the safety legislation of the applicable jurisdiction legal system.

4.2 Safety Statement, Safety Plan, Risk Assessment Method Statements:

You will provide a safety statement which shall identify the hazards of your work, assessment of risks; communicate these hazards and risks to your employees and to others who may be affected by your work on site; specify the way EHS are to be secured; the arrangements and resources; and the name of persons responsible in each case. (In many cases this safety statement is a generic document and shall be supplemented by a site specific EHS Plan and/or Risk Assessment Method Statements (RAMS) dealing with the work to be undertaken).





Arrangements for Co-ordination

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5.1 Supervision:

You shall provide effective supervision to ensure compliance with all applicable regulations, with the site safety rules and who will comply with all reasonable requests made upon them by Kirby Management in relation to EHS matters.

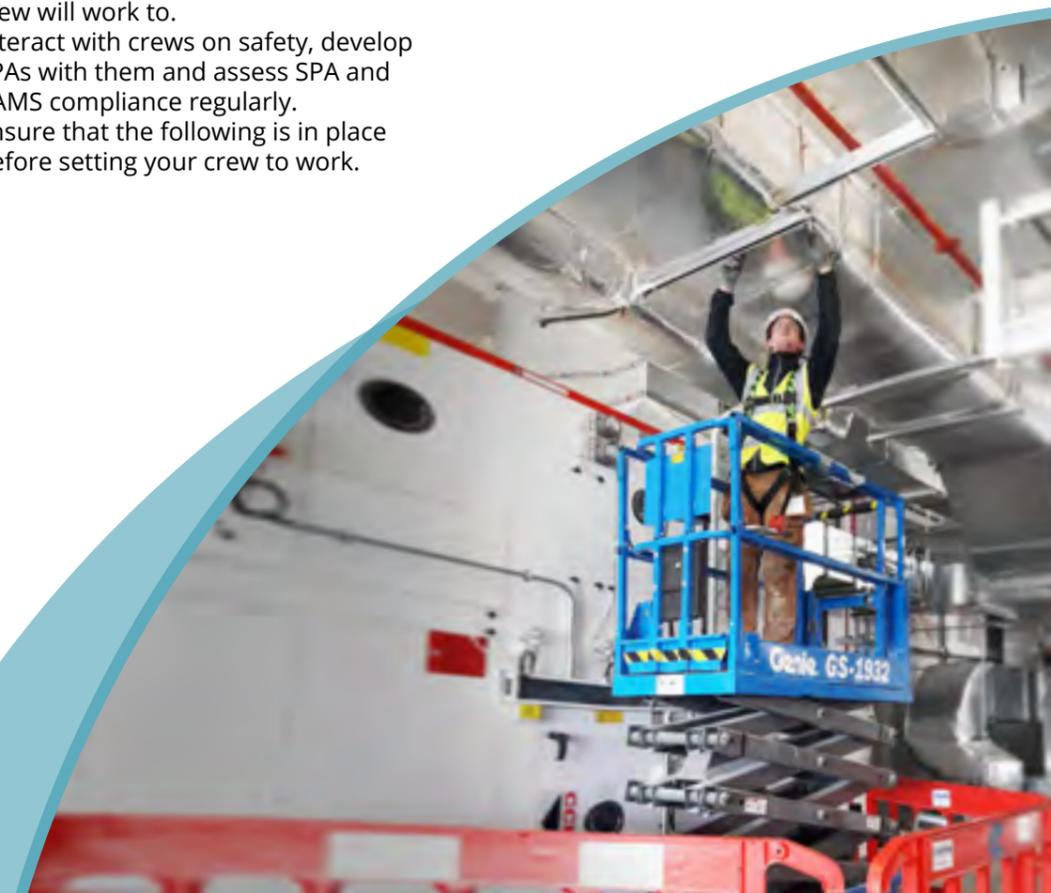
Supervisors will be required to supervise and coordinate all works on site. All supervisors shall hold an industry recognised site safety supervisor/manager course such as MSIC, SSSP, SMSTS, SSSTS or similar approved training.

You will participate in the Zero Harm program including SPA Assessments, SEORs daily, commendation for people and crews, attendance at toolbox talks and feedback to work crews.

The following are the Expectation of all Site Supervision/Management

- Know and understand the EHS objectives, standards and procedures for the project.
- You are expected to spend 70% of your time in the field.
- Always set a good example on site, this standard set by you is the standard your crew will work to.
- Interact with crews on safety, develop SPAs with them and assess SPA and RAMS compliance regularly.
- Ensure that the following is in place before setting your crew to work.

- » **Safe Place of Work**
 - Supervised crew.
 - Safe access & egress.
 - Good Housekeeping all day.
 - Barriers & Signage.
 - Coordinate with other work crews.
- » **Safe People**
 - Informed & instructed on Daily Briefings.
 - Competent and trained workers.
 - Toolbox Talks.
- » **Safe Plant and Equipment**
 - Certificates in date
 - Regular inspections and maintenance.
 - Good storage.
 - Remove defective equipment.
- » **Safe Systems of Work**
 - Communicate Risk Assessment Method Statement.
 - Safe Plan of Action.
 - Permits as required.
 - Correct PPE issued, in good condition and used.
 - Change management review of plans.



- Continuously assess the skills and wills of your crew. Provide constructive feedback aligned with improvements and insights.
 - » **Skill** is a measure of whether someone can perform a particular task and, more importantly, that they can repeat that performance unsupervised and to the standard required.
 - » **Will** addresses the attitude, motivation, and behaviour of an employee. It gauges the employee’s drive, commitment, and willingness to contribute positively to the team and organisation.
- Never place your crew at risk, the safe way is the right way.
- Where witnessed, report incidents including near misses immediately to the Kirby management team.

Please refer to Table 1.0 Requirements for number of Supervisors/ EHS Personnel Required.

You shall ensure that competent EHS resources are allocated as per the requirements in Table 1. Project EHS support will also be considered by using a risk-based approach, should the tasks to be carried out require a greater level of support such as high-risk activities. Any exemptions or deviation from these will be at the discretion of directors.

Table 1. Provision of Supervisor/Manager and EHS Resources

Employee Total	Resources for Sub-contractor Supervision/ Management & EHS
Every 15 Employees (Supervision)*	Site Supervisor - 1 x First Aid Responder on-site.
< 20 Employees	An EHS Professional shall be supporting the site team on a visiting basis. Point of Contact (PoC) shared to Kirby in the kick-off meeting. Ratio shall be 1 supervisor for every 15 (SSSTS / SMSTS / SSSP / MSIC)
≥ 20 Employees **	An EHS Professional shall be supporting the site team on a visiting basis. Point of Contact (PoC) shared to Kirby in the kick-off meeting. Frequency TBA on the project.
≥ 50 Employees **	An EHS Professional shall be supporting the site team on a weekly visiting basis. Point of Contact (PoC) shared to Kirby in the kick-off meeting. Frequency TBA on the project.
≥ 125 Employees **	A full-time EHS Professional (as defined) will be assigned to the project by the Contractor and be based on-site.

* Site Supervision requirements to fulfil management, safety and emergency role.
 ** Refer to Main Contractor and/or Client expectations as these may exceed the requirements of Kirby.

5.2 Setting to Work Requirements

You shall cooperate with the directions of Kirby management on site and participate in ensuring that works are co-ordinated with Kirby. The following setting to work arrangements shall be met:

Table 2. Setting to Work Requirements

Item	Requirement
Inductions and orientation	All personnel presenting to site shall be required to undertake a Kirby induction to site. Following this, the contractor shall provide their own orientation induction which is tailored and specific to their works package. Personnel who have not attended site for a period of 30 days or more shall be required to undertake a full Kirby induction. Training certifications relevant to the line of work in which the contractor is engaged shall be submitted to Kirby for review prior to induction bookings.
RAMS	Contractor RAMS shall be submitted to Kirby for approval at least 7 days in advance of the contracted works.
Point of Work Risk Assessments	You shall utilise the Kirby SPA (Safe Plan of Action) dynamic risk assessment for all works. This shall be completed daily. Manager, and Kirby EHS Manager.
Daily Activity Briefings	All contractor personnel shall attend the DAB each morning without exception.
Daily Whiteboard Meetings	These coordination meetings shall take place daily and prior to planned works activities. All contractors shall ensure that a managerial and supervision representative attends daily whiteboard meetings without exception.

5.3 Language

Kirby use English as the primary language, any sub-contractors shall ensure that their employees are provided with training in a form manner and language likely to be understood. A minimum of one translator, provided by the contractor, shall be present at training/induction programs to facilitate communication to non-English speaking personnel. Only fluent English-speaking operatives are to be engaged in safety critical roles, such as crane operators, banksmen etc.

5.4 Sub-Sub-Contracts:

You are required to obtain Kirby’s written approval in respect of all Sub-Sub-Contractors, which it is proposed to employ on this contract, to allow time for adequate review. You shall ensure that all sub-contractors comply with the requirements of this document and meet the standard of Kirby selection of Contractors. You shall ensure the EHS performance of all sub-contractors is managed, monitored, and reviewed.

5.5 Protect Common Safety Barriers:

You shall request permission from Kirby on site to change or remove any safety provisions such as railings, scaffolds, ladders, covers of openings, safety nets, fences, hoarding etc. This concerns all provisions which, when removed, result in danger for others. This applies irrespective of whose provisions these are.

5.6 Working Time

You shall comply with the relevant legislation associated with Working Time and the standard project hours set out in the EHS Plan. Out of Hours work shall be agreed with Kirby Management.

You shall ensure that fatigue management is considered when planning and resourcing contracted works.

Where fatigue is identified as a risk, contractors shall produce a fatigue management plan and submit to Kirby for review, demonstrating how fatigue shall be managed and controlled.

The following requirements shall be met:

Table 3. Working Time Requirements

Item	Requirement
Breaks	You shall provide one 30-minute and 15-minute break in a normal 8 hour working period.
Rest periods between shifts	You are required to plan for daily rest for all staff for at least 11 hours in a 24-hour day.
Weekly rest periods	For each period of 7 days a 24-hour consecutive rest period, in addition to a daily 11-hour rest period, shall be demonstrated. Kirby may request an additional 24-hour rest period following this at the contractor discretion, considering the task, environment, and physical state of the employee. You shall be able to demonstrate that employees, agency workers or those under their control have worked a maximum of 48 hours per week over a 17-week reference period.
Night works	Night workers are classed as those who regularly work night hours or 50% or more of their work hours are at night. Such workers will be offered an annual health check.

5.7 Sanctions

If you or your personnel fail to fulfill your obligations as referred to herein Kirby will have recourse to the following:

Rectify matters at your expense and/or your personnel may be refused access to the site.

Where a serious failure occurs, a non-conformance will be issued to you detailing specifics and requesting corrective actions. Corrective actions are to be agreed with Kirby. Where corrective actions are not implemented you will be removed from the approved contractors list.



Requirements for Sub-contractors work



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6.1 Risk Assessment Method Statement (RAMS)

You shall identify the hazards involved in the work and the preventative and protective measures necessary. The safe system of work, preventative measures, inspection and control measures are to be laid down by the sub-contractor. These are to be submitted to Kirby as an integral part of the RAMS for review and comment.

RAMS shall be submitted in a timely manner, minimum 7 days in advance.

The RAMS shall be adequately communicated to all relevant staff, assessed periodically and reviewed at least every 6 months and when the methodology or people or equipment and/or hazards change.

6.2 Safe Plan of Action (SPA)

The SPA is a dynamic risk assessment required for all tasks carried out during your works. The SPA is to be completed, communicated, signed by your team and available at the workplace for all tasks.

SPAs assessments will be carried out as part of the Zero Harm program. Assessments prioritise direct engagement at the work front. It's about collaborating with the craft, understanding the task at hand, and aligning it with the Safe Plan of Action.

Central to this is the concept of 'Touch Points' with the workers. These are pivotal moments or interactions that drive deeper engagement, fostering a culture of safety. By effectively utilising these 'Touch Points', we not only enhance the immediate SPA Process but also lay the groundwork for a continually evolving, the dynamic risk assessment process.

6.3 Work Methods and Protective Measures:

Your work methods shall take account of the hazards and risks; eliminate them if possible and/or arrange measures to control them. You are responsible for providing such safeguards as are necessary in relation to your own work. For example, use physical protective safeguards [scaffolds, roof edge, barriers, safety nets or similar] and/or PPE as appropriate to the hazards and risks involved.

You shall include measures to prevent danger to third parties. Third parties are all persons, including client staff, members of the public, other than your own and seconded employees. You will inform Kirby at an early stage of any dangers to third parties.

6.4 Entry and Exit to Site

To log entry to and exit from the Site, you shall observe all security and access requirements and procedures applicable to the Site, which includes the use of any access-based system operated by the GC and Kirby.

Entry and Exit Logs shall be used as assembly area checklists (roll calls), in the event of an emergency evacuation and are prepared to ensure that all persons are accounted for. The Emergency Co-ordinator will carry out a roll call with the assistance of the Site Manager / Supervisors. Every Sub-Contractor must have a Manager / Supervisor assigned to conduct a count of their employees.

6.5 Induction:

You shall ensure that all site operatives and management are inducted by your company (incl. safety statement, hazards, risks & controls) and attend the Kirby and other required induction training before work commences on site.

Kirby Online Induction shall be completed by all personnel before coming to site and completing the onsite orientation. The Online Induction is valid for 2 years on all Kirby projects. Advanced booking information and training records to be submitted and issued to Kirby, minimum of 48 hours in advance of briefing / familiarisation. Failure to comply will result in refusal.

Visitor induction will be provided to those who will not participate in physical activities, visitors shall be signed in and always accompanied by a fully inducted person.

6.6 Emergency:

You shall ensure that all your employees and those of your sub-contractors (if any) are prepared in the event of an emergency. Where you have more than 15 persons on a site you will provide a full time first aider, trained and equipped with necessary first aid materials.

6.7 Fire Safety

You shall provide and use adequate firefighting equipment for hot work tasks - fire extinguishers, fire blankets, welding screens, trained Firewatch etc. Highly flammable liquids shall be stored / locked in a safe manner in CoSHH cabinets.

6.8 Toolbox talks:

You shall ensure that all your site operatives are provided with and attend your toolbox talks and or attend toolbox talks hosted by Kirby, where safety information is given and there is an opportunity to raise concerns regarding safety, health and welfare on site.

6.9 Training and Competence

You shall ensure that all your works are managed, supervised and the work is carried out by suitably qualified, experienced and competent personnel. All employees and those of your sub-contractors (if any) shall comply in all respects with relevant 'Safety Rules' and carry current;

- Safe Pass/CSR/CSCS/VCA certification or equivalent, You shall provide all personnel and training records for all your employees on this project, evidence of training shall be provided prior to entry to site.
- CSCS/CPCS cards or equivalent e.g. Scaffolding, mobile towers, plant operators, roofing, slinging/signalling etc. You are required to partake in developing and providing communications such as safety alerts or interventions, advisories, lesson learned to all site employees as part of the site training communications.
- Manual Handling, Harness, MEWP and any other training as required by law in the relevant jurisdiction,

Table 4. Training Requirements

Name of Course /Training	Attendance required
Kirby Online Induction	All Personnel – before entry on site
Kirby Project Induction	All Personnel – before entry on site
Site Visitor Induction	All Visitors – before entry on site
Safe Pass / CSR/ CSCS / VCA	All Personnel – before entry on site
Manual Handling	All Personnel – before entry on site
Work at Heights	As Required
Safety Harness	As Required
MEWP	Operators - IPAF or Equivalent
MEWP Spotter	All MEWP Operators and Spotters
Mobile Tower / PASMA	Supervision of erection and inspection
Scaffolding	Personnel undertaking scaffolding activities
First Aid	As Required
Fire/Hot Works Training	As Required
Banksman/Slinger	Personnel undertaking crane and lifting activities
Respiratory Protection	As Required
Abrasive Wheels	As Required
ATEX	As Required
Telescopic Handler	Telehandler operators
Mobile Plant Spotter Training	Personnel undertaking Mobile Plant Spotter activities
Plant CSCS/CPCS	Plant operators (excavators, dumpers, cranes...)
360 Rotating Telehandler	Telehandler operators training + NPORS N010 / CPCS 360 Rotating Telehandlers

6.10 Plant, Tools and Equipment:

Plant, tools and equipment shall be in a good, safe and environmentally sound state of maintenance and comply with the applicable EHS regulations and standards. You shall have the required certificates for hoisting and lifting equipment and other plant before the plant or equipment is put into use on the site.

All Operation Manuals shall be available for plant & equipment. All plant, tools and equipment checks shall be issued to Kirby.

Table 5. Plant & Equipment Inspections

Inspections (Weekly)
Plant & Equipment (non-electrical)
Plant & Equipment (electrical)
Lifting Machinery, Lifting Accessories, MEWP's, Harnesses
All scaffolds, mobile towers, working platforms, ladders and steps
Portable Appliance Testing (PAT) (3 Monthly)
All electrical equipment, power tools and flexible extension cords
Statutory Inspections (6 Monthly)
Lifting Machinery, Lifting Accessories, MEWP's, Harnesses
Statutory Inspections (Annually)
Plant and equipment (non-electrical, or for lifting)
Cranes, Telehandlers, Hiab's & other plant used for lifting

6.11 Bandsaws

Portable Bandsaws provide an efficient and versatile means of cutting metal and hardwood. Bandsaws present cutting hazards to body parts placed in the line of fire of the blade. To reduce the risk of injury to the operators you will ensure that all portable bandsaws are fitted with 'Dual-Trigger' design for safe cutting, which requires two-handed operation. The second trigger provides extra safety as it forces the user to use both hands to activate the tool. With both hands on the triggers the risk of cut injuries is reduced.

6.12 Use of Knives

Knives are important tools that are used in many of our tasks. Knives come in many different forms and each type of knife presents different hazards, although the primary hazard is the sharp blade that can cause deep and severe lacerations.

- Always use retractable or covered blades- retract and never leave knives/blade exposed when not in use.
- Always use cut resistant gloves and Kevlar sleeve which are mandatory when using approved open blade type knives.

The following knives are prohibited;

- Knives with fixed blades including Trimming Knives that are not covered.
- Knives with snap off blades.
- Knives with double serrated edges.

6.13 Personal Protective Equipment [PPE]:

You shall supply your personnel with all necessary PPE as prescribed by Kirby or as identified in the risk assessment approved by Kirby. All PPE shall be suitable for the individual user and replaced as necessary. The use of the following PPE is mandatory on Kirby projects:

Required
PPE





» **Safety Helmet**

- Shall be worn correctly, never back to front.
- Wear chinstraps when working at height.
- Display wearers name on the front and back.
- Replace safety helmets if it has been involved in a fall or severe impact.



» **High Visibility**

- Hi-visibility clothing shall meet the requirement of flame-retardant fabric EN471 Class 2. (EN533)
- Orange Vest for Spotters & Slinger /Signallers



» **Safety Boots**

- Ankle support, a Steel Toecap and Mid Sole (BS EN 345, S3 Standard).
- Rigger type safety boots or safety shoes are not permitted.
- In good condition, steel toe caps shall not be exposed.



» **Gloves**

- Minimum standard of glove is BS EN388; 4543.
- Shall be worn for all tasks, seek approval for exceptions for certain tasks from Kirby Management Team.
- Gloves shall not be modified e.g. fingers cut off.
- o Gauntlets (cut resistant sleeves) shall be worn when using open blade knives, or other tools or material handling tasks that expose arms to cut hazards. This applies to handling sheet metal and ductwork with unfinished edges and handling other material with sharp edges.



» **Safety Glasses c/w side shields**

- Close fitting safety glasses are the minimum acceptable eye protection. (BS EN 166, 167 or 168).
- Specific tasks such as grinding or opening process equipment will require the use of goggles or full-face visor.
- Prescription safety glasses shall be used or over glasses are required if the user has no prescription safety glasses.



» **Ear Defenders**

- Wear ear defenders or ear plugs if the working area is noisy and where signage is posted.
- Attenuation characteristics shall be sufficient to reduce noise levels to below 80 dB (A). Hearing Protection shall meet the requirement of BS EN 352.



» **Personal Fall Protection Equipment (PFPE)**

- Full Body Safety Harness and Inertia Reels shall comply with BS EN 355, 360 and 361 standards.
- Harnesses or any other fall arrest equipment such as mini-blocks or inertia reels shall have certification and inspection records.
- Inertia reels (Turbolite) are required when working in a position where the user may fall.
- Safety belts and lanyards shall only be used upon approval of specific risk assessment.
- A full body harness with an adjustable lanyard (used to provide work restraint and adjusted to be as short as possible) is to be used when working from a boom type Mobile Elevating Work Platform (MEWP).
- A full body harness with either an adjustable lanyard or a retractable lanyard is to be used when working from a vertical lift type Mobile Elevating Work Platform (MEWP).
- The lanyard should be connected to the lowest available anchorage point in a MEWP, at or near floor level.

A full list of approved PPE is set out in the Site EHS Plan. Failure to comply with these requirements on the part of your personnel will result in disciplinary measures being taken. Where Kirby provide PPE, Kirby will reserve the right to back-charge for these services.

6.14 Apparel Policy

Long sleeve shirts and long trousers shall be worn on all projects. Tube type arm sleeves are an acceptable substitute for long sleeves. This applies to workers and visitors entering a designated project area (i.e., If a project requires a Hard Hat to enter the project area, then long sleeves are required). Exception: When long sleeves create a greater hazard for a specific task, this requires Project Manager approval. Shirts shall be buttoned up; sleeves shall be down and secured at the cuffs in all operational areas. Sleeves may be rolled up in non-construction areas (i.e., in the Office Areas). All shirts shall be tucked into trousers while on site. Trousers shall fully cover the legs and shall not be rolled up above the normal work boot at any time.

Clothing and boots are to be maintained in good condition by the employee without holes, tears or damage, and shall be replaced on an "as needed" basis.

Visitors shall be compliant with site requirements.

Jewellery requirements include the following which shall be applied for the Work Site:

- Finger Rings shall be covered or preferably not worn by persons performing Manual Handling tasks.
- No Earrings other than studs (small) are allowed.
- No body piercing jewellery on exposed parts of the body, including rings, studs or bolts.
- No chains/necklaces/bracelets that can swing outside work clothing.
- Watches are approved except where specific risks apply (i.e., no metal watches – High Voltage, etc.).
- NOTE: Medic-Alert (or similar Medical Condition ID) bracelets/necklaces are exempt.



6.15 Signage/Barriers/Lighting

Obey all signage and barriers, use signage and barriers to create exclusion zones around your works and do not enter exclusion zones without permission. Ensure sufficient lighting is provided at the task location.

6.16 Protection of Opes and Voids

Opes shall be created only under 'Permit Control'. Consider the protection of the ope / void in collaboration with Kirby. For Walk on Ceiling and/or Decking Platform the Load Bearing Capacity shall be taken into consideration when planning work and the maximum allowable load shall not be exceeded at any time.

- Ope / Void Size
- Pedestrian route, Vehicle & Pedestrian Route, Falling Material

The owner of the ope provides protection for those working at the same level and those working underneath.

6.17 Inspection:

You will provide for competent inspection of your works as required by law and in all other cases and submit a copy of your findings, with corrective actions by date/ person to Kirby. Your supervisor and/or EHS advisor will be required to carry out weekly EHS inspection and/or SPA Assessment on site and submit a copy of these to Kirby management team.

6.18 Housekeeping:

You will operate a 'clean as you go' policy throughout the project. You shall ensure that a good standard of housekeeping is always maintained and shall maintain the area of your operation in a clean, tidy and

safe condition and store your material in an orderly manner. Materials should only be brought to site when needed or as agreed with Kirby Management and the material should be stored safely in an area designated by Kirby. If Kirby resources are used to perform housekeeping / waste management Kirby will reserve the right to back-charge for these services.

6.19 Discipline and Commendation:

Kirby operates a Behavioural Card system where safe (good) and unsafe (bad) behaviours are logged and issued to individuals or groups. Green cards are issued for safe behaviour and yellow & red cards are issued for unsafe behaviour. Where you and/or your personnel are accused of breaches of health and safety legislation, rules and regulations, you/they will have their rights explained to you/them before any actions are carried out.

6.20 Incident Reporting and Investigation:

You are obliged to report immediately to Kirby dangers reported by employees, accidents, incidents (incl. Near Misses) and environmental incidents. In the event of an accident/incident you will carry out an immediate investigation and submit a copy of your findings with itemised "CORRECTIVE ACTIONS BY DATE/PERSON", to Kirby. Learning from incidents and near miss occurrences will help us all to reduce the potential for future injuries.

- Facilitate/encourage/promote the reporting of any/all accidents or near miss occurrences no matter how trivial.
- Investigate thoroughly and document findings.
- Take appropriate action and keep records.
- Communicate findings.

6.21 Safety Environment Observation Report (SEOR)

You and your personnel are obliged to participate in the Kirby Safety Environmental Observation Report (SEOR) program. This process shall be used to identify the indirect causes of unsafe conditions. SEORs are to be corrected immediately where possible. The SEORs will be analysed for trends which can be used to improve conditions on site through communications, co-ordination with the main contractor and others. A QR Code system is implemented for the SEOR program. Posters with the QR Code will be set up on key locations of the site.

6.22 Mobile Elevated Work Platform (MEWP)

Only qualified and trained personnel are permitted to operate MEWPs and only when a MEWP Spotter is in place. Only second year apprentices and above are permitted to receive MEWP training or operate MEWPs, unless a specific derogation is approved in writing by a

Director. This prohibition does not restrict first-year apprentices from working from a MEWP, provided that it is operated by a fully trained and competent MEWP operator. This ensures apprentices can still participate in work activities and gain exposure to the tasks associated with their trade — safely.

Exclusion zones are to be placed around MEWP activities with barriers securing access from unauthorised persons. All operators are required to wear a safety harness tethered to the correct anchorage point.

MEWPs shall be notified to Kirby, checked before use on site, have GA1 and Operation Manual available and the operator shall conduct daily checks with the spotter.

A Secondary Guarding device shall be installed on all boom type MEWPs. This equipment that can be fitted to 1b Static Booms and 3b Mobile Booms in addition to the primary guarding systems and is intended to further reduce the risk of entrapment.



Pressure sensing device

Pressure sensing bar – when activated, it stops further movement and activates audible and visual warning devices.



Pressure sensing device

Break-away or moveable pressure sensing stand-off bar – when activated, it stops immediate boom movement, activating audible and visual warning devices, and limits further platform movement.

6.23 Plant (Excavator, Dumper, Telehandlers) etc.

Operators shall have sufficient knowledge, training and experience in operating telehandlers. Formal training is required through recognised schemes such as CSCS (ROI) and CPCS/NPORS (UK). (See Mobile Plant and Equipment sect. 8.4)

6.24 Mobile Plant Spotter and MEWP Spotter Policy

This policy ensures the safety of individuals at sites where mobile-operated plants and vehicles operate. It sets the current standards for a safe work system. Spotters, also known as Plant and Vehicle Marshalls (PVMs), play a critical role in guiding the movement of plant and vehicles, focusing on preventing injuries and property damage. They are particularly vital in conditions of restricted visibility, close interactions between plant and personnel, or as determined necessary through risk assessments.

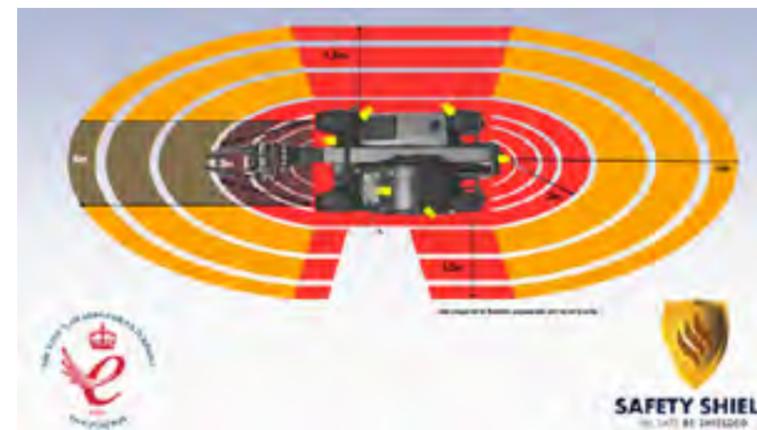
All spotters and operators require training and project specific briefing, this will be dependent on their role i.e., Plant Spotter or MEWP Spotter.

Plant Spotters to have completed a Kirby-recognised Plant Spotter course.

- NPORS PVM, CSCS Banksman (Slinger / Signaller), CPCS Plant Marshal.
- Approved Kirby Plant Spotter training course.
- Any other Sub-contractor or external Plant Spotter / PVM courses will only become recognised by Kirby through attendance / vetting by a Kirby EHS manager and approval by the Operations Manager / Senior Project Manager.

MEWP Spotters – Must have completed Kirby approved MEWP Spotter training.

- This will include, but not be limited to, familiarisation training on the MEWP being used along with training in ground emergency controls in the environment the MEWP will be used in.



6.25 Telehandler Human Form Recognition

You shall ensure all Telehandlers used for your works have Human Form Recognition, Safety Shield camera system installed.

The safety of people within the telehandler's working area, as well as the operators always depend on good operator visibility of the immediate vicinity in all situations, this can be aided using Human Form Recognition (HFR) camera systems.

6.26 Environmental Procedures:

You will ensure that you work to the Environmental System employed by Kirby and include environmental controls in RAMS as required.

You will use pollution prevention methods to reduce the potential of negative impacts to ground or surface water using spill protection and spill kits.

Quantities of Hazardous substances shall be kept and stored on site to a minimum level and be adequately protected (bunded containment and locked). All flammable or pressurised products shall be stored and locked externally if storage recommendations permit. All product labels shall be legible and stored appropriately as per SDS/COSHH assessments.

Waste shall be minimised and segregated in line with the project Waste Plan and SDS/ COSHH Assessments. Any waste duty of care documentation shall be kept on file and contain the correct information when received from specialist waste contractor.

6.27 Temporary Works

A temporary works coordinator (TWC) and temporary works supervisor shall be nominated by contractors who are engaged in or are using temporary works and shall be reportable to the Kirby TWC. Contractors are expected to demonstrate the competencies required for nominated persons to conduct each role.

A design brief should be prepared for each item of temporary works by the Temporary Works Designer serving as the focus for subsequent decisions, design work calculations and drawings. This shall be submitted to Kirby for review.

The design of the temporary works should be based on the agreed design brief, with any proposed alterations or modifications by the designer referred to the TWC. The temporary works will be designed in accordance with recognised engineering principles, with all design calculations, drawings and specifications undertaken with the same diligence as the design of permanent works.

Temporary works designs shall be categorised to indicate the complexity/simplicity of the specific temporary works structure and the potential risk.



Before erection commences, the temporary works design should be checked for the design concept, strength and structural adequacy (including foundations and lateral stability) and compliance with the design brief. An independent competent person(s) shall conduct design checks. Where the temporary works are more complex, or where innovative ideas are incorporated, the ability and independence of the person checking the designs will be greater.

The erection and dismantling of all temporary works shall be subject to Kirby EHS-069 permit to load/unload.

6.28 Young Persons:

You shall always seek to meet the detailed requirements of legislation protecting young persons in the workplace. You are required to inform the young person of any risks identified by your risk assessment and to inform their parents / guardians. All records shall be maintained and available.

You shall notify Kirby of any intention to employ or permit entry of young persons to the workforce beforehand. This shall include part-time workers or persons on work experience. For the purposes of this document, a young person is under the age of eighteen or are of particular risk due to their age.

You will put in place adequate control measures and supervision to ensure that the young persons are at no additional risk when compared to any other working group onsite.

Where Kirby is notified of the intention of a contractor to employ or deploy a young person to the work site, Kirby has the right to deny access to said young persons based on the risk assessment, nature of the work being undertaken, or current control measures in place for the workplace.

Under no circumstances shall lone working young persons be permitted on Kirby projects at any time.

6.29 Non-Hostile Work Environment

Kirby recognises that all employees have the right to work in an environment in which dignity of individuals is respected and which is free from physical aggression, bullying and harassment. Kirby will not tolerate or condone physical aggression, bullying or harassment in any form and is committed to creating a working environment that supports the dignity of all employees and to eliminating physical aggression, bullying and any other form of harassment.

6.30 Weapons Strictly Prohibited

Kirby will not tolerate the presence of weapons on site. Anyone found to be in possession of what would qualify as a dangerous weapon will be requested to leave site pending the outcome of an investigation. Should any weapons be used in a threatening manner the Police will be immediately notified.

6.31 Stop Work Authority

You have the authority to cease work on any project, without penalty or disciplinary action, if you believe the health or safety, or that of others, is at risk due to the existence of a hazardous condition or situation which cannot reasonably control or correct, providing:

- The employee takes all reasonable steps to make the area/equipment as safe or guarded as possible.
- The employee notifies a Kirby Supervisor or site office immediately.
- The employee makes every reasonable effort to carry out alternative duties (e.g. maintenance, clean up, set up etc.) until Kirby management remedies the condition.

Whenever refusal to work occurs, a Kirby EHS Advisor shall complete an incident report which includes an investigation and documenting actions in a report, to complete the process of correcting the unsafe item or activity.

6.32 Use of Handheld Devices

Kirby recognises the need for handheld electronic devices for use on site for business and personal requirements. Usage may include but not limited to auditing software/ photos/email/first-aid requirement/phone calls/messages. The roles that will require full use of electronic devices throughout the site are:

- Project Manager
- Site Manager
- Site Supervisor
- EHS
- QS
- Engineers
- Emergency Responders

For all other staff, device use should be restricted to a safe zone. If an existing location does not already exist on site, then Kirby will establish this and highlight the area with signage, in an agreed location with the client.

- For personal phone use this should be restricted to the safe zone/welfare compound.
- Ensure that information or photos relating to the site or works entailed will not be uploaded or shared to internet platforms/applications or social media accounts.

Device use for machine operators is strictly isolated to the safe zone and under no circumstances should the operative use it whilst controlling machinery.



6.33 Management of Change

Kirby recognises that certain changes, both internal and external to the organisation (including, but not limited to, changes in personnel, sub-contractors, management, activities, processes, physical environment, plant, equipment, procedures, legislation, regulations, standards, systems and services) may have implications on EHS requirements. To ensure the successful planning of a change, the following should be considered:

- Define the change (purpose).
- Consult with personnel involved in the change, making an assessment using the knowledge and experience of the workforce.
- Identify the resources necessary to make the change.
- Ensure technical integrity and potential EHS impacts of the change are understood.

All changes shall be documented, analysed, initiated and approved at the appropriate level prior to work commencing or recommencing after identification of the need for change.

Changes will be followed with notifications to field personnel and as required, suitable training sessions will be conducted.

6.34 Occupational Health

You are required to identify all occupational hazards which may affect the workforce during contract duration and communicate the findings to Kirby and to all employees involved in the task.

You shall ensure worker health is monitored during all hazardous activities through the life cycle task (Start /Middle /End), to ensure optimum occupational health requirements are met.

6.35 Dangerous Substances:

You will ensure that a safety data sheet (SDS) is provided and available for any hazardous substance in use. Personnel are to be instructed about the risks and measures to be taken based on the information given in the SDS sheets prior to the use of hazardous substances.

You shall keep all records of hazardous substances/activities of which they undertake on site, including COSHH assessments and SDS.

You shall ensure the atmospheres for the use of any hazardous substance are safe to be used this may include confined space works. You shall be either registered / permitted to carry any known hazardous substances/ Dangerous goods in company transport in line with local requirements. Any vehicle carrying dangerous goods shall make provisions for accidental spillage and carry ADR vehicle spill kits.

6.36 Drugs and Alcohol Policy

Any supply of illegal drugs or alcohol is forbidden on any Kirby project. Anyone found participating in such activities will be removed immediately from site and could face criminal charges. Any contractor found consuming illegal drugs or alcohol whilst on site will be removed from site after consultation with local police to ensure safe removal and wellbeing of contractor and could face criminal charges.

You will be required to provide at their cost a drugs and alcohol test for any employee who has been involved in any work-related activity within a timely manner of the incident.



You may be required to undertake a 'with cause' or 'random' drugs and alcohol test at any stage. Contractor refusal to participate in drug or alcohol testing without compelling cause, or attempts to tamper with a test sample, will be treated the same as a positive test result and may result in removal from site.

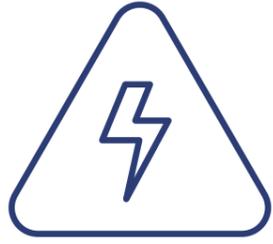
Information on any prescribed medication, which could impair an individual's ability, shall be informed at induction. Medication which is kept on site shall have a label which shall be legible and prescribed to named person. Failure to provide this could lead to Kirby requiring a letter of proof from a doctor.

6.37 Noise

Assess noise exposure and where necessary implement a system of controls for the adequate monitoring and control of noise exposure during the duration of the works conducted. Where noise poses a risk due to the nature of the works, you shall notify Kirby of the nature of the risk and of the control measures that shall be put in place.

6.38 Vibration

You shall put in place a system for the adequate monitoring and control of vibration exposure within the workplace during the duration of the works conducted, including both Whole Body Vibration (WBV) and Hand Arm Vibration (HAV) exposure.



High Risk Activities

07



HIGH RISK ACTIVITIES

The following section includes the arrangements expected for controlling significant risks. It does not cover all site activities and it therefore remains the contractor's / supplier's responsibility to ensure that their works are conducted in a safe and environmentally responsible manner which complies with relevant legislation within the relevant jurisdiction which is current at that time.





7.1 Electricity and Energy Isolation

All work on systems with the potential to be energised shall be under permit control, managed by Kirby.

Electrical work, including repairs to electrical tools, plugs, fittings and leads, shall only be undertaken by licenced and competent electricians.

All energy sources shall be isolated prior to commencing work on electrical equipment. Do not operate any energy isolating device until Lockout process is completed.

Personnel shall use their own personal locks attached to isolating devices for any system that has the potential to be energised. Treat all systems as live and always prove for dead.

Any person who receives an electrical shock injury shall undergo an electrocardiogram (ECG).

7.2 Working at Height

Working at height equipment selection is based on the hierarchy of controls with priority given to collective measures e.g. Scaffold, MEWP, Mobile Tower, Podium Ladder, Ladder).

Edge protection shall be placed and maintained around the edges of opes, walkways, excavations, raised floor access. Fixed edge protection shall be installed by competent persons.

Inspect all work at height equipment for damage prior to using each day. Report any damage to site management and remove damaged equipment.

Use suitable tool bags, back packs, tool tethers or similar when working at height to prevent dropped objects.

Where works are being carried out at a height where a person is likely to fall and injure themselves a safe system of work will be provided complete with Emergency Rescue Plan.

You will use reasonable efforts to avoid the use of ladders and promote the "ladders last" policy by actively seek out safer alternatives for elevated work tasks. Where step ladders shall be used, they will be of

the platform design or equivalent. Kirby will maintain a permit system to assure the "ladders last" policy is executed and to assess alternatives when platform ladders cannot be used. No A-frame ladders are permitted on site.

Portable ladders used by for electrical work shall be constructed from insulated materials and be non-conductive.

7.3 Lifting Operations and Suspended Loads

All lifting operations shall be planned by a competent AP with a recognised accredited certification. This shall be submitted to Kirby for review and acceptance no later than two weeks prior to the lifting activity.

The planning of all lifts shall include a physical lift study of the site / project and be carried out by a competent AP.

All lift plans shall be submitted to Kirby with the above information as a minimum and communicated to the lift team prior to the lifting operation by a nominated competent person (AP, Lift Supervisor) with signatures obtained to confirm the lift teams understanding of instruction.

All lifting operations shall be carried out under Kirby EHS-067 Permit to Lift which shall be specific to each lifting operation and issued for a maximum of one day.

Protect all lifting and suspended loads zones from entry by unauthorised personnel. Never go under a suspended load.

7.4 Mobile Plant and Equipment

Where work is carried out involving any movement of vehicles, regardless of type or task, and regardless of party operating the vehicle (e.g., working in areas where public may be operating vehicles such as road works), measures shall be taken to ensure that pedestrians and personnel are

segregated from vehicles and that vehicle operations are controlled and monitored in such a way as to pose no risk to site personnel or to any other parties effected by the works.

You shall take steps to ensure that the following requirements at a minimum are met:

- Comply with all driving related legislation and any other related Codes of Practices or acts and endeavour to adopt best practice where practicable for those driving on behalf of Kirby.
- Ensure the safety of employees whilst driving on behalf of Kirby and that the safety of other road users and members of the public are not compromised.
- Ensure employees are appropriately qualified (valid / relevant driving license) and trained.
- Ensure vehicles are suitable for use and are checked and inspected regularly.
- Ensure drivers are medically fit to drive.
- Plan works to ensure vehicle plant can operate at a safe distance from pedestrians.
- Ensure all plant and vehicle movements are coordinated and managed by a competent and trained Mobile Plant Spotters.
- Ensure adequate provision of Mobile Plant Spotters for plant.
- Provide barriers, signage, supervision, and any other resources necessary to prevent incidents involving vehicle plant.
- Implement traffic management systems where necessary, such as stop/go systems.
- Contribute to and comply with any traffic management plans or control measures implemented within the project or scope of works and will provide any information or resources or personnel necessary to remain compliant with regards to the plan.
- Where the nature or scope of the work changes such that the current controls or plans in place to manage traffic or vehicle and plant movement are no longer sufficient or do not provide the envisioned protection, you will notify Kirby and will work with and comply with any additional provisions or requirements outlined.

7.5 Ground Disturbance

All ground disturbance works shall be planned, monitored, and supervised by competent persons who have proven skills, knowledge, and experience for the role which they are to conduct. All persons conducting these works shall demonstrate relevant competence and recognised accredited certifications.

Ground Disturbance (excavations) works shall be in accordance with good practice guidance for the jurisdiction in which they are working, for example:

- UK – HSG47 ‘Avoidance of Underground Services’.
- ROI – HSA ‘Code of Practice for Avoiding Danger from Underground Services.’

You shall ensure that an excavation register is maintained as a live document throughout the course of the activities.

You shall ensure that CAT and Genny scanning is conducted and details of the scanning are recorded. You shall use a CAT4+ or better, with GPS function when scanning for underground services.

Kirby shall issue permits to dig on Kirby form EHS-068 for all ground penetrating works. These are valid for a maximum of 1 week only.

All excavations shall be inspected by a competent person at a maximum of weekly intervals, or sooner following periods of adverse weather or any significant changes. These shall be recorded on an excavation inspection form.

All excavations shall have edge protection installed around the perimeter at a suitable distance from the excavation edge to protect site personnel from falling into the excavation. In addition, signage shall be installed highlighting the presence of the excavation.

Stockpiles shall be located away from the excavation in an area agreed with the Kirby site management team.

You are to ensure that any de-watering of excavations does not pose an adverse threat to the local environment, including watercourses and surface water drainage systems.



More than a Program,
It's in our DNA



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